REMARKS

Reconsideration of this application is respectfully requested.

The rejection of claims 24, 26-31, 34, 36-41, 44 and 46-51 under 35 U.S.C. § 103 as allegedly being made "obvious" based on Addink '477 in view of Jacobs '548 is respectfully traversed.

Independent claims 24, 34 and 44 have been amended to require each originating terminal to send updates to specific destination terminals in dependence on whether an error exceeds a threshold, wherein the threshold is dependent upon the recited measurement of relevance and the error is computed using the recited comparison. Accordingly, dependent claims 26, 36 and 46 are now cancelled.

Addink discloses updating only the thirty closest objects in the game (column 5, lines 6 to 9). However, there is no disclosure of measuring distance between entities to define a measurement of relevance. Nor, since Addink does not disclose comparing the data of a local object and the predictive data of a duplica, could any such measurement be used as an error threshold in such a comparison. The only threshold discussed in Addink relates to comparing a base clock offset and a new clock offset, wherein if this difference is greater than a predetermined threshold value the base clock offset is changed (column 6, lines 26 to 44). This error is not a comparison between data of two objects, and the threshold is not dependent upon a measurement of relevance. Thus the independent claims are novel over Addink. Further since Addink neither teaches nor suggests adjusting an error threshold, the independent claims are also non-obvious and patentable.

Jacobs discloses a modular simulation system in which simulator stations are linked via a network. Jacobs discusses using position history based dead reckoning (PHBDR) to reduce

network traffic (column 5, lines 17 to 40). However, it is clearly stated at line 30 that the threshold used is preset. There is no disclosure in Jacobs of altering this threshold in any way, and no disclosure of determining a measurement of relevance between entities. Thus the independent claims are also novel and non-obvious over Jacobs.

The combination of Addink and Jacobs would lead a skilled person to suggest a system which uses PHBDR as in Jacobs, but only updates a set number of close entities as in Addink. Conversely, the independent claims describe a system where the threshold used in PHBDR is dynamically altered according to a measurement of relevance. There is nothing in either Jacobs or Addink that would lead the skilled person to suggest altering the threshold. Thus the independent claims are patentable over a combination of Addink and Jacobs.

The rejection of claims 32, 33, 42, 43, 52 and 53 under 35 U.S.C. § 103 as allegedly being made "obvious" based on the three-way combination of Addink/Jacobs in further view of Katz '642 is also respectfully traversed.

Katz is wholly concerned with simulating sustained contact between objects (see abstract). Katz discusses and discards prior art prediction algorithms (column 3, lines 25 to 39), and thus does not suggest using a dynamically altered error threshold. Further, Katz does not teach or suggest measuring any kind of distance or relevance between objects, and in fact solves a problem that only occurs when objects are very close together. Thus the independent claims are novel and non-obvious over Katz, and over the combination of Katz with Addink, Jacobs or both.

As noted above, the applicants' claimed invention is novel and non-obvious even if all of the cited references <u>are</u> selectively dissected and then selected parts reassembled as suggested by the Examiner (no doubt using applicants' claims as a template for such selection). However, it is

respectfully noted that such hindsight selective combinations are almost never "obvious" within the meaning of 35 U.S.C. § 103 merely because they may all be "drawn to the same problem, which, in this case is the efficient updating of player data in a multi-player network system". Indeed, the fact that so many people have been working for so long to find better ways of achieving this end result is itself evidence that it would not be obvious to use hindsight to pick and choose among selected features of numerous prior art approaches. The facts reveal that those actually working in the prior art did not find it obvious to do such selective picking and choosing and recombining. Most typically, such selective reconstruction is even incompatible with one or more aspects of the teaching of one or more of the instances of prior art selected from among a great many others.

Accordingly, this entire application is now believed to be in allowable condition and a formal notice to that effect is respectfully solicited.

Respectfully submitted,

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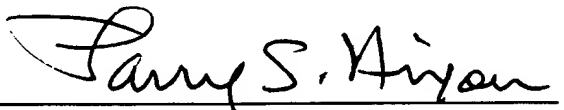
By: 

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